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July 28, 2006

Via electronic filing

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SE
Washington, DC 20554

Re: Cable & Communications Corporation
CC Docket No. 94-102
August 1, 2006 Report

Dear Ms. Dortch:

Pursuant to the Commission's *Order*,¹ Cable & Communications Corporation ("C&CC") hereby submits the following report on its progress in achieving the goal of 95% penetration of ALI-capable handsets among its subscribers.

Summary

In its progress report filed herein on May 1, 2006, C&CC reported an ALI-compliant handset penetration rate of 47%. As of July 21, 2006, that number had grown to 55%. C&CC did not meet its first benchmark penetration rate goal (C&CC had projected reaching a 60% penetration rate by August 1, 2006). Accordingly, C&CC has refocused its outreach and marketing efforts of the past three months, and has also revised its penetration benchmark projections.

In accordance with paragraph 21 of the *Order* and its past practices, C&CC continues to coordinate with area PSAPs and other emergency service providers, keeping them apprised of its activities and progress in meeting handset penetration goals. This information is shared formally through serving PSAPs with copies of all FCC filings related to this issue, as well as informally, through occasional telephone conversations and meetings.

In recognition of the remaining condition imposed by paragraph 21 of the *Order*, C&CC reports its continuing regular reminders to subscribers that upgrading their analog handsets will enable them to transmit their location information automatically once PSAPs have implemented Phase II E911 capabilities. In addition, C&CC will inform subscribers when Phase I and Phase II requests are received from PSAPs, and will provide regular updates regarding the anticipated implementation dates.

¹ In the Matter of Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, Cable & Communications Corporation Petition for Waiver of Section 20.18(g)(1)(v) of the Commission's Rules, *Order*, FCC 06-39 (rel. Mar. 23, 2006) ("*Order*"). The *Order* granted Cable & Communications Corporation ("C&CC") an extension of 18 months after its release to meet the requirement of Section 20.18(g)(1)(v) that 95% of the handsets used by its subscribers be location-capable, subject to specific conditions and reporting requirements. The instant report is the second required under the *Order*.

Report

Pursuant to paragraph 22 of the *Order*, C&CC provides the following information:

(1) The number and status of Phase II requests from PSAPs (including those requests it may consider invalid):

C&CC has received no Phase I or Phase II request from any PSAP.

(2) The estimated dates on which Phase II service will be available to PSAPs served by its network:

C&CC provides cellular service to a geographic area served by nine (9) different PSAPs in Montana and one in North Dakota. Each PSAP is willing to work with C&CC regarding the timing for implementation of a Phase I or Phase II request. C&CC's May 1, 2006 Report provided detailed information regarding the status of PSAP plans. The following information reflects reported modifications to anticipated PSAP implementation readiness plans reported previously:

PSAP

Anticipated PSAP Implementation Date

Petroleum Co. Sheriff

Phase I and Phase II capable but no current plans to make Phase I or Phase II request of C&CC

Rosebud County Sheriff

Finalizing Phase I capability; Phase II capability estimated in approximately 18 months, depending on funding availability

(3) The status of its coordination efforts with PSAPs for alternative 95% handset penetration dates

As reported above, all PSAPs have been informed of the extension until September 23, 2007, or eighteen months after the release of the *Order*. All PSAPs have indicated a willingness to work closely with C&CC regarding Phase II implementation schedules.

(4) Efforts to encourage customers to upgrade to location-capable handsets:

C&CC continues its two-prong approach to encouraging customers to upgrade their handsets through subscriber education and the provision of subscriber upgrade incentives.

C&CC will continue a summer promotional campaign (copy of advertising attached) which offers a free phone, free activation and 10% discount on accessory purchase when an existing subscriber extends his contract for two years or when a new subscriber signs a two-year contract. This promotion is featured in newspaper and radio advertising, and featured on the community advertising channel on cable systems throughout the C&CC service area. In addition, posters promoting this campaign are displayed in each business office, and many local county fairs.

The attached billing inserts, which are designed to include information regarding PSAP implementation of Phase I and Phase II capabilities, will be included in each subscriber bill until 95% penetration is achieved. In addition, C&CC will continue its general education campaign, including occasional utilization of its parent company's bi-monthly magazine, as well as utilizing fliers and posters in retail establishments, to educate consumers regarding the benefits of digital upgrades and to inform subscribers of C&CC's build-out progress.

C&CC continues its build-out program with two recent phase two applications to add new service areas, as well as improve existing service, with the proposed North Lambert and Alzada cell sites. It is anticipated that these sites will be operational by the second quarter of 2007.

(5) Percentage of customers with location-capable phones:

C&CC reports that 55% of its customers had location-capable phones as of July 21, 2006.

(6) Status in achieving compliance and whether it is on schedule to meet the revised deadline

C&CC did not succeed in meeting the 60% penetration goal it proposed in its May, 2006 report. The number of new subscribers did not meet expectations. Accordingly C&CC has revised its proposed penetration benchmark schedule as follows:

November 1, 2006 – 62%

February 1, 2007 – 75%

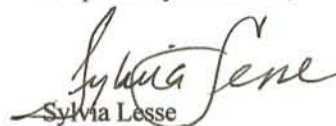
May 1, 2007 – 88%

August 1, 2007 – 95%

To achieve these goals, C&CC will continue to design and conduct aggressive marketing campaigns, modifying its approach where experience dictates. In light of recent experience, C&CC is reviewing its promotion and education program and reassessing its incentive program to stimulate interest in digital upgrades. In addition, C&CC will continue to work with PSAPs, and anticipates collaborating with certain PSAPs in public education campaigns when Phase II capabilities are introduced.

Please direct any questions or correspondence concerning this matter to this office.

Respectfully submitted,


Sylvia Lesse



Receive a **FREE*** Motorola V262 flip phone with a new activation or contract extension **PLUS**

FREE activation
(an additional \$15.00 savings)

AND

10% off all accessories

* Two-year contract required.
Promotion ends June 30, 2006.

Call Mid-Rivers Cellular at 1-800-452-2288 or
visit your nearest Mid-Rivers Service Center.

Turn this over for more information about Mid-Rivers Cellular.

To take advantage of the future implementation of Phase II E-911 automatic location capabilities, you must have a digital cellular phone. If, during an emergency, you are unable to give your location to the PSAPs (911 centers), that information will be sent automatically from a digital cellular phone. Therefore, it is recommended that you procure a digital cellular phone as soon as possible.

Turn this over for information about Mid-Rivers Cellular's latest digital cell phone promotion.

Cellular Accessories

Cellular phone accessories are available from your nearest Mid-Rivers Service Center or you can order from a huge selection of cell phone accessories available on the Mid-Rivers web site.

Point your web browser to www.midrivers.com, select "Cellular Service" on the left-hand side. Then select "Cellular Accessories."

Secure online purchases are available with the use of a credit card. For your convenience, your purchased items are shipped directly to you.



Receive a **FREE***
flip phone with a new activation or
contract extension **PLUS**
FREE activation
(an additional \$15.00 savings)
AND
10% off all accessories

* Two-year contract required.
Promotion ends July 31, 2006.

Call Mid-Rivers Cellular at 1-800-452-2288 or
visit your nearest Mid-Rivers Service Center.

Turn this over for more information about Mid-Rivers Cellular.

To take advantage of the future implementation of Phase II E-911 automatic location capabilities, you must have a digital cellular phone. If, during an emergency, you are unable to give your location to the PSAPs (911 centers), that information will be sent automatically from a digital cellular phone. Therefore, it is recommended that you procure a digital cellular phone as soon as possible.

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Important

To take advantage of the future implementation of Phase II E-911 automatic location capabilities, you must have a digital cellular phone. If, during an emergency, you are unable to give your location to the PSAPs (911 centers), that information will be sent automatically from a digital cellular phone. Therefore, it is recommended that you procure a digital cellular phone as soon as possible.



Flip into summer



with a free flip phone

from Mid-Rivers Cellular!



Receive a **FREE***
Motorola V262
flip phone
with a new
activation or
contract
extension

PLUS

FREE activation

(an additional \$15.00 savings)

AND

10% off all accessories

***Two Year contract required**
Promotion ends June 30, 2006


Mid-Rivers
Cellular

- 904 C Ave, Circle 485-3301
 - 11 E Montana Ave, Baker 778-2812
 - HWY 212 Copps Hardware, Broadus
- Or call 1-800-452-2288

DECLARATION OF GERRY ANDERSON

I, Gerry Anderson, General Manager of Cable & Communications Corporation, do hereby declare under penalty of perjury that I have read the foregoing "August 1, 2006 Report" and that the facts stated therein are true and correct, to the best of my knowledge, information and belief.

July 24, 2006
Date



Gerry Anderson

Certificate of Service

I, Sylvia Lesse, of Communications Advisory Counsel, LLC, hereby certify that on this 28th day of July, 2006, I caused to be delivered, via first-class US mail, postage prepaid, a copy of the foregoing "August 1, 2006 Report" on the following:

Captain Kevin Krausz
Miles City Police Dept.
PSAP for Custer County, Montana
PSAP for Garfield County, Montana
2420 Bridge Street
Miles City MT 59301

Sheriff Kelly Pierson
Garfield County Sheriff's Office
PO Box 103
Jordan MT 59337

Chief Alan Michaels
Glendive Police Department
PSAP for Dawson County, Montana
PO Box 1372
Glendive MT 59330

Chuck Lee
PSAP Manager - Fallon County
PSAP for Fallon, Carter,
Prairie and Wibaux Co's, MT
PO Box 1061
Baker, MT 59313

Sheriff Rusty Jardee
Carter County Sheriff
PO Box 323
Ekalaka MT 59324

Russ Lindblom
North Dakota 911 Manager
PO Box 877
Bismarck, ND 58502-0877

Jeff Cohen*
Wireless Telecommunications Bureau
Federal Communications Commission
445 Twelfth St, SW
Washington, DC 20554

Michael J. Wilhelm*
Chief, Pub.Safety & Critical Infrastruc. Div.
Wireless Telecommunications Bureau
Federal Communications Commission
445 Twelfth St., SW
Washington, DC 20554

* Via electronic mail

Sheriff William Klunder
Prairie County Sheriff's Office
PO Box 126
Terry MT 59349

Sheriff Darby S. Harrington
Wibaux County Sheriff's Office
PO Box 322
Wibaux MT 59353

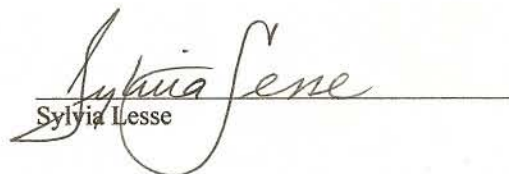
Sheriff Dave Harris
McCone County Sheriff's Office
PSAP for McCone County, Montana
905 B Avenue, PO Box 201
Circle, MT 59215

Sheriff John Blain
Powder Riv. Co. Sheriff's Office
PSAP for Powder River Co., MT
Box 71 Courthouse Square
Broadus MT 59317

Sheriff Brad Baisch
Richland County Sheriff's Office
PSAP for Richland Co., MT
110 2nd Ave NW
Sidney, MT 59270

Lisa Solf
Petroleum County PSAP
PO Box 226
Winnett, MT 59087

Jim Kenner, IT Dept.
Rosebud County Sheriff's Office
Box 85 180 S 13th St
Forsyth, MT 59327


Sylvia Lesse